

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

CLERK'S OFFICE

SEP 12 2005 P 3:00

MARK ULIANO,
Plaintiff

vs.

MARIE H. BISSEL and
KENNETH J. TILDEN,
Defendants

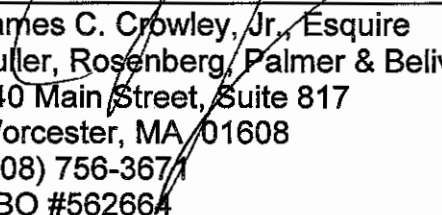
CIVIL ACTION
NO. 04-10797 GAO

**DEFENDANT, MARIE BISSEL'S EXPERT WITNESS DISCLOSURE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(2)**

Pursuant to Rule 26(a)(2), the Defendant, Marie Bissel, hereby notifies the parties to this action of her intention to call Dr. Robert R. Pennell as an expert medical witness on her behalf. Dr. Pennell will either testify in person, through videotape deposition, or his report of August 16, 2005 will be offered into evidence pursuant to M.G.L. c.233, §79G. A copy of Dr. Pennell's curriculum vitae and his report of August 16, 2005 is attached. Dr. Pennell's testimony will consist of opinions regarding the plaintiff's current condition, his pre-existing medical condition prior to the motor vehicle accident, the relationship of any conditions to the motor vehicle accident, the plaintiff's prognosis and about the extent to which the plaintiff was disabled as a result of the motor vehicle accident. He will testify about these matters based on his education,

experience, and the details of his expected testimony are outlined more fully in his report of August 16, 2005, a copy of which is attached.

Defendant, Marie Bissel
By Her Attorney,



James C. Crowley, Jr., Esquire
Fuller, Rosenberg, Palmer & Beliveau
340 Main Street, Suite 817
Worcester, MA 01608
(508) 756-3671
BBO #562664

CERTIFICATE OF SERVICE

I, James C. Crowley, Jr., hereby certify that I served the foregoing document by mailing a copy of same, first class mail, postage prepaid, to the following counsel of record:

Stephen J. Delamere, Esquire
Bierhans, Delamere & Cohen, LLC
294 Pleasant Street, Suite 204
Stoughton, MA 02072

James T. Sullivan, Esquire
Avery Dooley Post & Avery, LLP
90 Concord Avenue
Belmont, MA 02478

Elton Watkins, III, Esquire
238 Essex Street, 2nd Floor
Lawrence, MA 01840



James C. Crowley, Jr.